

REMARKS

1. In response to the Office Action mailed December 18, 2003, Applicant respectfully requests reconsideration. Claims 1-20 were last presented for examination. Claims 1-20 were rejected in the outstanding Office Action. By the foregoing amendments, all pending claims have been canceled without prejudice or disclaimer. New claims 21-39 have been added. Thus, upon entry of this paper, claims 21-39 will be pending in this application. Of these 17 claims, two claims (21 and 32) are independent. These amendments are believed not to introduce new matter and their entry is respectfully requested.

Claim Rejections Under 35 U.S.C. §112, second paragraph

2. The Examiner has rejected claims 1, 9, 10, 18, and 19 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Cancellation of Claims 1, 9, 10, 18, and 19 render this rejection moot. Accordingly, Applicant respectfully request that these rejection be withdrawn.

Claim Rejections

3. Independent claims 1, 10 and 20 have been rejected under 35 U.S.C. §102(e) as being anticipate by U.S. Patent No. 6,598,035 to Branson, *et al.* (hereinafter, "Branson"). Dependent claims 2, 3, 11 and 12 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Branson in view of U.S. Patent No. 6,654,754 to Knauff, *et al.* (hereinafter, "Knauff"), while dependent claims 5, 7, 14 and 16 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Branson in view of U.S. Patent No. 5,708,825 to Sotomayer. (hereinafter, "Sotomayer").

4. Applicant has cancelled claims 1-20 and has replaced them with new claims 21-39, thereby rendering these rejections moot. However, Applicant provides the following observations regarding the references relied upon by the examiner in the rejection of canceled claims 1-20.

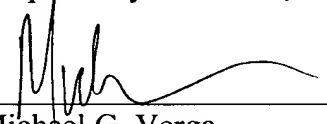
5. In the rejections, the Examiner observed that Branson teaches "a document can be modeled in software using members of the inline or container classes," citing column 10, lines 29-32 of Branson in which it is noted that "a designed can design how individual objects

interrelate to make up a solution to a specific programming problem.” The Examiner made a further observation that because objects can be extended or derived to create a child class, the claimed feature of “the container class corresponds to a document item in which other items can be nested” is inherent in Branson. Applicant respectfully disagrees and asserts that Branson neither discloses, teaches nor suggests utilization of object-oriented classes to produce source or executable code that automatically produces a markup language document. The portions of Branson relied upon by the examiner teach basic functionality provided by object-oriented programming languages; there is not mention whatsoever of producing a software program that automatically produces a markup language document, as recited in Applicant’s new independent claims. Thus, Branson neither anticipates nor renders obvious Applicant’s invention as recited in the new claims. In addition, Knauff nor Sotomayer, which are relied on for allegedly teaching features recited in certain dependent claims, neither teach nor suggest that which is missing from Branson. Accordingly, Applicant respectfully asserts that new claims 21-39 are patentable over Branson taken alone or in combination with the other art of record.

Conclusion

6. In view of the foregoing, this application should be in condition for allowance. A notice to this effect is respectfully requested.

Respectfully submitted,



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